



**Department of the Interior - Indian Affairs  
FY 2012 Environmental Management Assessment Program**

Division of Environmental and Cultural Resources Management  
12220 Sunrise Valley Drive  
Reston, Virginia 20191

Audit Start Date 10/2/2012 : Audit Completion Date 10/4/2012

**Environmental Management Assessment  
Program (EMAP) Audit Summary Report  
Prepared for EPA**

N32-10 T'iis Nazbas Community School (K-8)-B  
Hwy. 160 BIA Road N5114 - TeecNosPos, Arizona





# EPA Audit Report



N32-10 T'iis Nazbas Community School (K-8)-B on 10/2/2012 - 10/4/2012 (EMAP (v 1)) by jfrerich

## Hazardous Waste Management

Finding	Days NC
59. Failure to properly dispose of unused OR out-of-date chemicals. 40 CFR 262.11 (a-d) (RCRA)	Unknown
<b>Recommended Corrective Actions</b>	
Develop plans to properly dispose of un-used and/or out-of-date chemicals by: Conducting a complete review of chemicals to identify that they are no longer used; Collect the chemicals identified for disposal in a location that provides protection from weather, has spill containment, and allows for separation of incompatible materials; Conduct a waste characterization by determining which chemicals are hazardous waste (meeting one or more of the four characteristics: ignitability, corrosivity, reactivity, or toxicity), or is a "listed" hazardous waste (Part 261, Subpart D), or a waste mixed with a listed waste; Determine the generator status of the facility based on the quantity of hazardous waste accumulated; Obtain an EPA Identification Number is the facility is now a Small or Large Quantity Generator; Arrange for a hazardous waste service contractor to properly identify, package, and ship chemicals to an authorized hazardous waste treatment and disposal facility; (If Small or Large Quantity generator - ensure Hazardous Waste Manifest is shipped with waste); Obtain and maintain all documentation related to waste characterization, transport and disposal in a location referenced in the EMS. To prevent recurrence, develop a chemical inventory and limit the purchase of hazardous chemicals and replace hazardous chemicals with a green product.	



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## Miscellaneous Maintenance Wastes

Finding	Days NC
7. Failure to document the length of time universal wastes have been accumulating as a waste. 40 CFR 273.15(c) (RCRA)	Unknown

### Recommended Corrective Actions

Label universal waste containers with the accumulation start date to verify the length of time batteries, lamps or, thermostats have accumulated as a waste. Develop a procedure for universal waste management that identifies how universal waste will be labeled from start of generation to disposal. Some suggestions are: Place the waste in a container and mark / labeling the container with the start date the material became a waste; Or mark/label each individual item with the date it became a waste or was received; or maintain a log or inventory system on-site that identifies the date each universal waste became a waste or was received. Maintain the standard operation procedure in the record location specified in the EMS

Finding	Days NC
8. Failure to inform employees on handling procedures/operating procedures for universal wastes including emergency response procures in case of a release. 40 CFR 273.16 (RCRA)	Unknown

### Recommended Corrective Actions

Provide clear instruction and training to employees who handle or have responsibility for managing used batteries, lamps, or thermostats. Including emergency response procedures / actions to be taken for releases from leaking containers or broken lamps. Document the instructions and employee training in the record location specified in the EMS.

Finding	Days NC
15. Failure to manage universal waste in containers or packages that are structurally sound and adequate to prevent breakage and releases. 40 CFR 273.13(d)(1) (RCRA)	Unknown

### Recommended Corrective Actions

Manage Fluorescent Lamps as a universal waste and contain in containers or packages that are structurally sound, adequate to prevent breakage, and compatible with the contents of the lamps. Keep containers and packages closed and routinely monitor for evidence of leakage, spillage or damage that could cause leakage under reasonably foreseeable conditions. Maintain records of routine monitoring and file in record location specified in the EMS.

Finding	Days NC
16. Failure to immediately clean up releases from broken lamps to minimize the threat of a release of hazardous waste into the environment. 40 CFR 273.13(d)(2) (RCRA)	Unknown

### Recommended Corrective Actions

Immediately clean-up releases from broken lamps in accordance with the manufacturers specifications. Place waste material in a container that is structurally sound and compatible with the contents. Determine if any releases are hazardous, and dispose of accordingly if determined to be hazardous waste. Maintain records of releases, clean-ups, actions taken, disposal and notifications. Keep records in the location specified in the EMS.

Finding	Days NC
17. Failure to label or clearly mark containers containing lamps. 40 CFR 273.14(e) (RCRA)	Unknown

### Recommended Corrective Actions

Clearly label / mark containers containing universal waste lamps with the start accumulation date using one of the following phrases: "Universal Waste - Lamp(s)," or "Waste Lamp(s)," or "Used Lamp(s)".



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## Spill Prevention Control and Countermeasure

Finding	Days NC
7. Failure to review/update the SPCC plan every three years or when changes occur at the facility. 40 CFR 112.5(b) (CWA)	Unknown
<b>Recommended Corrective Actions</b>	
Review the SPCC Plan every three years by management. Develop a review signature sheet to verify a review was conducted. Maintain a copy of the review in the SPCC in the file location specified in the EMS.	
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Finding	Days NC
20. Failure to conduct above ground storage tanks inspections for leaks by visual or hydrostatic testing. 40 CFR 112.7(e)(2)(xi) (CWA)	Unknown
<b>Recommended Corrective Actions</b>	
Test above ground storage tanks for leaks by visual or hydrostatic testing. Tank supports and foundations are included in these inspections. Routinely inspect the outside of the tank for signs of deterioration, leaks, or accumulation of oil inside diked areas. Keep records of these visual inspections and maintain in the file location referenced in the EMS.	
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Finding	Days NC
27. Failure to conduct spill prevention briefings to ensure adequate understanding of the SPCC Plan. 40 CFR 112.7(e)(10)(iii) (CWA)	Unknown
<b>Recommended Corrective Actions</b>	
Conduct spill prevention briefings, including descriptions of potential spill events, spill prevention methods, and spill response, for operations personnel at intervals frequent enough to assure adequate understanding of the SPCC Plan. Document briefings and maintain the record in the file location referenced in the EMS.	



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## Toxic Substances Management

Finding	Days NC
12. Failure to provide annual written notification to parents, guardians, teachers, and employees of the Asbestos Management Plan and keep a copy of the notification in the Asbestos Management Plan. 40 CFR 763.93(g)(4) (TSCA - AHERA)	Unknown
<b>Recommended Corrective Actions</b>	
Once per school year, provide written notification to parents, guardians, teachers, and employees of the availability of the Asbestos Management Plan.	
Finding	Days NC
22. Failure to designate a person responsible for asbestos oversight/management. 40 CFR 763.84(g) (TSCA - AHERA)	Unknown
<b>Recommended Corrective Actions</b>	
Designate a person to ensure that requirements concerning asbestos in schools are properly implemented. Train this employee to perform his/her duties. Document training and maintain the training record at the location specified in the EMS.	
Finding	Days NC
26. Failure to post asbestos warning labels in areas where friable asbestos containing materials is present. 40 CFR 763.95(a-c) (TSCA - AHERA)	Unknown
<b>Recommended Corrective Actions</b>	
Post labels in areas where: friable asbestos containing materials was treated in any other way than removal and where asbestos containing materials is present, but no treatment was taken. Labels must read "CAUTION: ASBESTOS. HAZARDOUS. DO NOT DISTURB WITHOUT PROPER TRAINING AND EQUIPMENT."	
Finding	Days NC
33. Failure to maintain records for required abatement, preventative measures taken and any response actions taken at the facility and on file for three years. 40 CFR 763.94(a) (TSCA - AHERA)	Unknown
<b>Recommended Corrective Actions</b>	
Keep all asbestos records at the school. Records pertaining to asbestos materials abatement, preventive measures conducted, and response actions. Maintain records on file for at least three (3) years after the next re-inspection. Record locations are referenced in the EMS.	
Finding	Days NC
41. Failure to label items that contain PCBs. 40 CFR 761.40 (TSCA)	Unknown
<b>Recommended Corrective Actions</b>	
Clearly label / mark materials containing PCBs with the words PCBs.	

## Water Quality

Finding	Days NC
4. Exceeded contaminant levels for drinking water. 40 CFR 141(f) & (g) (SDWA)	Unknown
<b>Recommended Corrective Actions</b>	
Adjust chemical feeds and clean filter units appropriately to correct exceedance of permit parameters. Follow procedures outlined in the facility's manual regarding intake feeding units. If additional technical assistance is required, contact OFMC. Conduct the proper follow-up sampling and public notification that is required. Continue sampling and following up until exceedance is not longer out of spec.	
Finding	Days NC
8. Failure to document and maintain collection information requirements for public water systems as required. 40 CFR 141(m) (SDWA)	120
<b>Recommended Corrective Actions</b>	
Maintain information collection requirements for public water systems for three years and report to EPA or Tribe/state as required. Keep copies of all reports submitted in the file location referenced in the EMS.	

A copy of the information provided by IA to the Auditor regarding the date each building at the facility was constructed, if reasonably known is provided as an attachment